

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

filed at FORT LAUDERDALE BRANCH

22-CIV-61246-Singhal/Valle

CASE NO. \_\_\_\_\_ -CIV JUDGE/MAGISTRATE \_\_\_\_\_

MICHAEL J. HASON,

Plaintiff

vs.

WALMART, INC.

Defendant.

COMPLAINT

AS FOR A CAUSE OF ACTION IN NEGLIGENCE

1. This court has jurisdiction due to diversity of residencies of the parties, 28 USC1332. The Plaintiff is a citizen of Florida and, on information and belief, Defendant is a citizen of Arkansas, but incorporated in Delaware. The amount in controversy is greater than \$75,000.
2. The Plaintiff fell in Defendant's store on June 2, 2018. The store was and is located at 3306 N. University Dr. in Sunrise, FL.
3. The Plaintiff was a business invitee/shopper at the store and was owed a duty of care by the Defendant and its employees.
4. This duty was breached by an employee who left an empty pallet in a spot that

was not easily seen by the Plaintiff. Plaintiff caught his right foot on this pallet and fell over leftwards hitting his left side hard on the floor. The incident was reported to a store manager shortly after the fall.

5. The Plaintiff suffered bodily injuries due to the fall, causing him to suffer pain and disability that worsened with time. The Plaintiff also suffered monetary losses, costs and expenses due to the injuries. The Plaintiff's fall was actually and proximately caused by the unreasonable and unsafe behavior of the Defendant's employee who left the pallet as mentioned above.

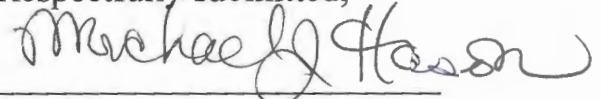
6. A jury trial is requested.

7. The Defendant's employees have continued leaving unloaded pallets on the store floors, despite notice of the risk of injury to shoppers, which supports punitive damages.

WHEREFORE, the Plaintiff requests that this Court issue a judgment in favor of the Plaintiff in the amount of \$2,000,000, plus an award for punitive damages and for costs, fees and expenses.

Dated: July 30<sup>th</sup>, 2022

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Michael J. Hason", written in dark ink over a horizontal line.

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